

RATIONALE FOR ALLOCATIONS

1.11, 1.12, 1.13 Wilderness. The Blended Plan supports the addition of pristine wilderness management in the remote interior of the Holy Cross Wilderness which is the only significant change from the existing condition shown in Alternative B. Thus the Plan used the allocations from Alternative “C” which we think are best since the allocation do not provide for pristine management in Willow and Maroon Creeks area of the Maroon Bells Wilderness. The Blended Plan reflects the belief that reaching pristine management in this area is not attainable without wilderness rationing through a permit system, an expensive and invasive change not evaluated in the Draft Forest Plan.

1.2 Recommended Wilderness. The White River National Forest is approximately 1/3 designated wilderness, a proportion higher than any other National Forest in Colorado and most others across the nation. The existing wilderness is high quality. Appendix “C” Recommended Wilderness documents that the social need for wilderness experience is met by already designated wilderness. Remaining inventoried roadless often contain substantial evidence of man’s activities, particularly the many small areas adjacent to existing wilderness. The decision to exclude these adjacent lands which are often of limited size was already made in the original Wilderness decision. The Blended Plan proposes the designation of eight areas adjacent to designated wilderness based on their possession of wilderness values and local constituent desires. Five of these (Treasure Mountain, No Name, Black Lake West, Ute Pass, and Acorn Creek) are rated high in all three primary elements. The remaining three (North Independence, Hunter, and Black Lake East) possess sufficient wilderness characteristics to merit designation.

1.31, 1.32, 3.31, 3.32 Back Country Recreation. The Blended Alternative provides a balance of motorized, non motorized and mountain bike trail opportunities. The area open to snowmobiles is less than Alternative “B” and more than Alternative “D”. Some loop road and trail opportunities are provided for motorized travel and for mountain bike users. More trails and roads are open to mountain bikes than Alternative “D”. There are fewer roads left open than Alternative “B”, but more than Alternative “D”.

1.41 Core Areas. Alternative B, C, E, and F do not use this prescription. Alternative “D” uses this prescription for only one area. We believe adequate prescriptions such as 5.4 Forested Flora and Fauna Habitats and 5.43 Elk Habitat are available for this one area without adding to the complexity of understanding and managing this large National Forest.

1.5, 3.4, and 4.4 Wild, Scenic and Recreation Rivers. The Blended Alternative supports the Forest Service staff findings that the South Fork of the White River, the Crystal River, Deep Creek, the Colorado River, and Cross Creek meet the eligibility standards for consideration as Wild and Scenic Rivers.

2.1 Special Interest Areas - Limited Use. There is concern that this prescription adds to the complexity of managing National Forest land which could meet desired conditions through other prescriptions and the use of existing regulations without severe restrictions on human use. That said, the Blended Plan reflects the belief that the Continental Divide Land Bridge unit merits special consideration because of its importance as a wildlife travel corridor, Deadhorse Creek because of its Karst formations and very difficult access, and Taylor Pass because of its small size and number of threatened and endangered plant communities. Quandary Peak is not included in this recommendation for limited use special interest areas because my team thinks this area warrants management as an equally restrictive prescription of Research Natural Area.

2.2 Research Natural Area. The Blended Plan recommends the designation of two research natural areas for each of the two Sections on the White River National Forest. These selections were made based on quality of the candidates as inventoried for number of plant associations as shown in Table G-1 in Appendix G and potential conflicts with important recreation uses and other National Forest resources. For the Highland Section, the Assignment Ridge Area and the Gift and Cline Creeks area provide the best candidates. For the North Parks Section, Difficult Creek provides the best candidate. In this Section, the Blended Plan also recommends the Quandary Peak Special Interest Area with 8,690 acres because of its significant threatened and endangered plants including potential habitat all 12 of the state's rare species. Appendix H analysis says it was not selected as an RNA because of its small size. However, many of the Research Natural Areas recommended in other alternatives are smaller in size. Quandary Peak is the Plan's highest priority for designation as a Research Natural Area.

3.1 Special Interest Areas - Use or Interpretation. The Blended Alternative reflects the belief that interpretation of historic events is highly desired by visitors to the White River National Forest. Camp Hale and Holy Cross City-Gold Park provide the best opportunities. There are other interpretive opportunities but they do not warrant the large land allocations proposed. This Plan supports continuing the Ashcroft special use permit to the Aspen Historical Society, implementation of limited interpretation of identifiable sites in Coal Basin, and interpretation of the Hagerman Tunnel and the Old Independence Townsite.

3.55 Corridors Connecting Core Areas. There are no identified connecting corridors in Alternatives B, C, D, E, or F. There does not appear to be a need for this prescription since we identified no core areas.

4.23 Scenic Byways. National Forest Scenic Byways are very popular and provide an important recreation opportunity. They also bring visitors which improve the economic viability of private business in adjacent communities and resorts. The West Elk Loop and Flat Top Trail are already National Forest Scenic Byways. The Top of the Rockies is a Colorado State Scenic Byway which is recommended for National Forest designation as well.

5.42 Bighorn Sheep Habitat. See Management Area Allocation document for the disposition of vacant range allotments relative to bighorn sheep habitat.

5.45 Forest Carnivore. Management Alternative D proposes to manage 116,900 acres to meet the habitat needs of lynx. At present there is not a viable lynx population on the White River National Forest. It is not clear whether a significant population lynx ever existed, and whatever ecological niche the lynx may have filled has been assumed by other predators. The "Description of Management Practices Affecting Population Viability and Recovery" on page 3-222 of the D.E.I.S. indicates that adequate habitat conditions for lynx already exist. The U. S. Fish and Wildlife Service in its recent listing stated "In the Southern Rockies Regions, the amount of lynx habitat is relatively limited and does not contribute substantially to the persistence of the contiguous U.S. lynx population." (Federal Register 16,052; 16,059; and 16,061 [2000])

Colorado Department of Natural Resources provided the following information concerning 5.45 Forest Carnivores:

"The desired condition discusses the need for dense regeneration of conifer forest types, which provide habitat for snowshoe hares eaten by lynx. This may be the most limited habitat condition for lynx in Colorado and, thus, the most badly needed. Some of the worst coniferous habitat types for snowshoe hare and lynx could be the lodgepole pine forests. The WRNF plan states that the forest currently has about 2% of the lodgepole pine in the 1-20 year age class while in 1887, 24% of the forest was in this structural stage. Lodgepole pine forests may have the highest potential to produce high densities of snowshoe hare for lynx and other forest carnivores and raptors. However, when these forests mature, they shade out the understory and become almost biological deserts, providing habitat only for red squirrels or hiding cover for big game such as elk."

"While there is also a need to preserve some mature lodgepole pine, present conditions are outside the historic range of variability (HRV). From an ecological standpoint, it appears the WRNF needs to treat significantly more lodgepole pine forests to obtain a younger 1-40 year age class. The treatment could include prescribed burns, "let burn" natural fires and commercial logging. Maintaining ground cover is important for hare populations throughout the forest rebuilding process."

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“The plan states that the Spruce-Fir forests are within the range of historic variability and this is good snowshoe hare and lynx habitat. While we agree with this statement, preliminary data from our snowshoe hare track surveys indicates that “old growth” forests are not as productive to snowshoe hares as mature forests. Therefore it may be necessary to treat some old-growth Spruce-Fir to improve snowshoe hare habitat. However, Forest Carnivores 5.45 standards for vegetation management (Standard 1.) preclude Spruce-Fir as part of the allowable sale quantity. This should be modified.”

In view of the above, the Blended Plan has allocated only one area to prescription 5.45 in an area adjacent to Vail as per an agreement between the Forest Service and Vail Resorts. The remainder of the 5.45 prescription is designated for management under the 5.4 prescription. The Blended Plan reflects the belief that it is much wiser to manage for a diversity of habitats which would benefit a wide range of species including lynx.

8.25 Ski-Based Resorts - Existing and Potential. There is an over-all reduction of 10,486 acres from the 1984 plan to this proposal. Four existing downhill ski areas do not change. The remaining seven retain allocations which, for the most part, move boundaries to definable locations such as ridge lines. This resolves administrative problems with people leaving ski area boundaries to climb higher and ski back into the ski area and allows better provisions for safety such as avalanche control and search and rescue. Boundaries are also adjusted for several ski areas to omit unneeded and not used terrain. Keystone, Breckenridge, Beaver Creek and Arapahoe Basin retain their allocations to improve the quality of skier experience by spreading crowded situations and providing a better balance of available skier terrain, pending compliance with NEPA and Forest Service approval.

Summit County supports consideration of possible expansion for Copper Mountain, Breckenridge, Keystone and Arapahoe Basin. These areas of expansion are already considered in the Summit County Master Plans where they are designated as Recreation and Resource-Public.

One new ski area allocation, an adjusted Rifle Ski Area, is retained from the existing Forest Plan.

A significant reserve of undeveloped terrain does not remain within existing White River National Forest ski area permit boundaries. Although some undeveloped terrain is suitable for development, most is not due to the presence of wetlands, poor snow cover, wind, relation to the sun, cliffs, and boulder areas. The Draft Environmental Impact Statement at 3-334 projects demand for downhill skiing capacity will increase 33% in Garfield County, 33% in Eagle County, and 29% in

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Summit County by the year 2010. The DEIS projects no need for additional acres of downhill ski area in Pitkin county through 2010.

The Forest Service needs to preserve the flexibility to consider expansion proposals driven by changing market developments during the life of this plan. Developments like high speed lifts and snowboarding were not anticipated 15 years ago but the 1984 Forest Plan provided the flexibility to analyze site specific proposals through the NEPA process. The White River National Forest Plan should ensure similar flexibility.

8.31 Aerial Transportation Corridors. No corridors are allocated. The Blended Plan reflects the belief that the opportunity exists to reduce motor vehicle congestion, enhance visitor experience, and save on consumption of motor vehicle fuel. However, since no governmental entities or ski corporations are interested in preserving the option at this time, the Blended Plan has not included them.